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Suite 400  
Washington, DC 20004

September 1, 2004

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
12th Street Lobby, TW-A325  
Washington, D.C. 20554

**Re:   *Ex Parte* Presentation  
      ET Docket No. 00-258**

Dear Ms. Dortch:

On Tuesday , August 31, 2004, David Munson of Sprint Corporation (“Sprint”) and Cecily Cohen of Nokia met with Ron Chase, Shameeka Hunt, Ira Keltz, Ahmed Lahjouji, Salomon Sathe and Priya Shrinivasan of the Office of Engineering and Technology (“OET”) to discuss “overload” interference tests recently performed by Nokia with respect to a mobile wireless service operating in the spectrum located at 1915-1920 MHz and 1995-2000 MHz (the “H Block”), as outlined in the attached presentation. Also participating via conference call-in were Luisa Lancetti, Paul McCarthy and Harry Perlow of Sprint, Meetul Parikh, Greg Sutton and Eric Kestenbeck of Nokia, Bruce Franca of OET, and Peter Corea, Jay Jackson, Marty Liebman and Blaize Scinto of the Wireless Telecommunications Bureau. Copies of the attached presentation were provided to participants in the meeting. OET personnel requested certain additional information concerning the Nokia testing, which will be filed in the record in this docket as soon as it can be obtained.

As depicted in the attached presentation, Nokia performed tests on seven Personal Communications Services (“PCS”) handset models in use today to confirm the susceptibility of such devices to “overload” interference caused by the inability of the PCS handsets’ receive filters to sufficiently attenuate in-band H block emissions. Nokia also examined temperature response characteristics of various duplexers. Among other things, the test results demonstrate that:

- Direct Conversion Handsets employing SAW filters, which are widely deployed, with millions of handsets in the marketplace, employing SAW filters would experience significant “overload” interference from H Block transmissions.
- When performing the same tests using C and G Block signals as the interfering sources, no “overload” interference was created.
- Attenuation and frequency variations are dramatic over the normal operating range of a duplexer in the handset – as the duplexer gets hotter, the performance degrades significantly.

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- Higher operating temperatures result in less attenuation across the entire H Block.
- Although the Nokia tests were limited to the last H Block transmit channel and its impact upon the first A Block receive channel, the response in duplexer performance to temperature shifts suggests that “overload” interference problem can be attributed to all H Block channels – not just the channel closest to the PCS A Block.
- Additional testing is required to confirm the scope of this problem, and Sprint and Nokia expressed willingness to work with the FCC on further testing and technical analyses concerning H Block interference issues.

In sum, the test results confirm that if the H Block is allocated for mobile services, significant power limitations (likely throughout the H Block transmit band) must be imposed along with the out-of-band emissions criteria set forth in PCS industry standard, TIA 98-F, to avoid adverse impacts to PCS consumers.

Pursuant to Section 1.1206 of the Commission’s Rules, this letter is being electronically filed with your office. If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

/s/ Luisa L. Lancetti

Luisa L. Lancetti  
Vice President, Wireless Regulatory Affairs

Attachment

cc:

Bryan Tramont  
Cheryl Wilkerson  
Jennifer Manner  
Paul Margie  
Sam Feder  
Barry Ohlson  
John Muleta  
Ed Thomas  
Bruce Franca  
Ahmed Lahjouji  
Blaise Scinto  
Brian Carter  
Gary Thayer  
Geraldine Matise  
Martin Liebman

Mary Woyteck  
Nese Guendelsberger  
Peter Corea  
Peter Trachtenberg  
Shameeka Hunt  
Ira Keltz  
Ron Chase  
Jay Jackson  
Salomon Satche  
Priya Shrinivasan  
Uzoma Onyeije  
Jim Schlichting  
Jamison Prime  
Tom Derenge